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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES  
BY: \_\_\_\_\_

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

February 2017 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER PSAILA,

Defendant.

CR No.

**17CR00257**

I N D I C T M E N T

[18 U.S.C. § 1029(a)(2): Use of an  
Unauthorized Access Device; 18  
U.S.C. § 1343: Wire Fraud; 18  
U.S.C. § 1028A(a)(1): Aggravated  
Identity Theft]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1029(a)(2)]

Beginning on or about December 1, 2015, and ending on or about  
November 30, 2016, in Los Angeles County, within the Central District  
of California, defendant CHRISTOPHER PSAILA ("PSAILA") knowingly and  
with intent to defraud, used an unauthorized access device (as  
defined in Title 18, United States Code, Section 1029(e)(1) and (3)),  
namely, an American Express credit card, and by such conduct obtained  
things of value aggregating at least \$1,000 during that period, with  
said use affecting interstate and foreign commerce.

COUNTS TWO THROUGH EIGHT

[18 U.S.C. § 1343]

A. INTRODUCTORY ALLEGATIONS

1. At all times relevant to this Indictment:

a. Defendant PSAILA and others known and unknown to the grand jury, operated two companies, Marco Marco LLC and MarcoSquared, LLC (collectively, "Marco Marco"). The business of Marco Marco LLC was to design and sell custom-made costumes. The business of MarcoSquared, LLC was to design and sell underwear.

b. American Express ("AmEx") processed all credit card charges made in the western United States by wire through a server in Phoenix, Arizona.

B. THE SCHEME TO DEFRAUD

2. Beginning at an unknown date but no later than January 26, 2015, and continuing through on or about November 30, 2016, in Los Angeles County, within the Central District of California, defendant CHRISTOPER PSAILA ("PSAILA"), knowingly and with the intent to defraud, devised, participated in, and executed a scheme to defraud victim E.G. ("E.G."), as to material matters, and to obtain money and property from victim E.G. by means of material false and fraudulent pretenses, representations, and promises, and the concealment of material facts.

3. The scheme to defraud victim E.G. operated, in substance, in the following manner:

a. Victim E.G. provided Marco Marco with the account number for her AmEx credit card ending in 63516 to facilitate her purchase of costumes.

b. Defendant PSAILA, knowingly and with the intent to defraud, caused charges to be made on victim E.G.'s AmEx credit card ending in 63516 without victim E.G.'s authorization.

c. As a result of defendant PSAILA's scheme, AmEx suffered losses in excess of \$700,000.

C. USE OF THE WIRES

4. On or about the following dates, in Los Angeles County, within the Central District of California, defendant PSAILA, for the purpose of executing the above-described scheme to defraud, caused the transmission by means of wire communication in interstate and foreign commerce, by charging victim E.G.'s AmEx card ending in 63516 without authorization:

| <u>COUNT</u> | <u>DATE</u>       | <u>AMOUNT CHARGED</u> |
|--------------|-------------------|-----------------------|
| 2            | October 21, 2015  | \$7,500               |
| 3            | December 28, 2015 | \$8,500               |
| 4            | March 29, 2016    | \$7,600               |
| 5            | April 14, 2016    | \$9,156               |
| 6            | May 23, 2016      | \$9,256.37            |
| 7            | June 8, 2016      | \$10,300.50           |
| 8            | August 10, 2016   | \$10,355              |

COUNT NINE

[18 U.S.C. § 1028A(a) (1)]


Beginning on or about December 1, 2015, and ending on or about November 30, 2016, in Los Angeles County, within the Central District of California, defendant CHRISTOPHER PSAILA ("PSAILA") knowingly possessed and used, without lawful authority, a means of identification that defendant PSAILA knew belonged to another person, namely, the name and American Express account number of victim E.G., during and in relation to the offense of use of an unauthorized access device, a felony violation of Title 18, United States Code, Section 1029(a) (2), as charged in Count One of this Indictment.

A TRUE BILL

/s/  
Foreperson

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